



OHM Corporation

February 26, 1991

Ms. Mardi Klevs
United States Environmental Protection Agency
Region V
Office of RCRA (5HR-13)
Michigan Section
230 South Dearborn Street
Chicago, IL 60604

LETTER OF TRANSMITTAL
RCRA FACILITY INVESTIGATION FOR
MACDERMID INCORPORATED
AT THE FERNDAL, MICHIGAN, FACILITY
MID 005 338 371

Dear Ms. Klevs:

OHM Remediation Services Corp. (OHM), a wholly owned subsidiary of OHM corporation, is pleased to submit the enclosed report for the above-referenced work. This abbreviated RCRA Facility Investigation (RFI) report encompasses Task I and Task II, as well as the Draft Work Plan for all three Solid Waste Management Units (SWMUs) described in MacDermid's RCRA Part B Permit.

SWMUs were addressed in this RFI as described in the Part B Permit as:

- o SWMU No. 1--the two closed surface impoundments (i.e. lagoons)
- o SWMU No. 2--the incinerator/units that emit air contaminants
- o SWMU No. 3--the inactive railroad spur

Following an intensive data search for air emissions information pertaining to the old incinerator and the scrubber unit associated with the recycling tanks, the results were conclusive enough to formulate a Draft Work Plan for SWMU No. 2 (i.e. incinerator/units that emit air contaminants) that could be incorporated into the primary RFI report. This should facilitate the overall Work Plan Schedule.

February 26, 1991

Enclosed are three copies of the report with the accompanying appendices. One copy is unbound for your convenience, in the event you should need additional copies. If you have any questions please call me or Pat Potts at 800-537-9540. I look forward to your comments and the opportunity to proceed with the Work Plan.

Sincerely,

James W. Voorhees, Jr. p3

James W. Voorhees, Jr., CPG
Manager, Geosciences
Midwest Region

JWV:at

pc: Mr. James Batozynski
MacDermid Incorporated
1221 Farrow Avenue
Ferndale, MI 48220

Mr. Frank Cruice
MacDermid Incorporated
245 Freight Street
Waterbury, CT 06702

Pat Potts

P 664 395 460

**Certified Mail Receipt**

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5HR-13/RCRA Permitting Branch/MI Sec/KLEVS

PS Form 3800, June 1990

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Frank J. Cruice	
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254 Freight Street	
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Waterbury, CT 06702	
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3. Article Addressed to:

Frank J. Cruice
Corporate Director
Safety, Risk and Regulatory Compliance
MacDermid, Incorporated
254 Freight Street
Waterbury, CT 06702

5. Return to Addressee

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6. Signature — Agent

X

7. Date of Delivery

Handwritten signature
2/25

4. Article Number

P 664 395 460

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DOMESTIC RETURN RECEIPT

FEB 21 1991

5HR-13

CERTIFIED MAIL P 664 395 460
RETURN RECEIPT REQUESTED

Frank J. Cruice
Corporate Director
Safety, Risk and Regulatory Compliance
MacDermid, Incorporated
254 Freight Street
Waterbury, CT 06702

RE: RFI Schedule
MacDermid, Incorporated
(Ferndale, Michigan)
MID 005 338 371

Dear Mr. Cruice:

Conditions III.A. and B. of the Hazardous and Solid Waste Amendments portion of the Resource Conservation and Recovery Act permit for MacDermid, Incorporated (Ferndale, Michigan) require the facility to address corrective action for four solid waste management units. The purpose of this letter is to inform you that the United States Environmental Protection Agency approves the schedule that you submitted, dated February 8, 1991, for the submittals of the draft and final RCRA Facility Investigation (RFI) workplans and for the implementation of the RFI itself.

We look forward to receiving the draft workplans for Operable Units 1, 2, and 3. If you have any questions concerning this matter, please contact Mardi Klevs of my staff, at (312) 886-6195.

Sincerely,
ORIGINAL SIGNED BY/
KARL E. BREMER

Karl Bremer, Chief
RCRA Permitting Branch

cc: Jim Batozynski
Operations Manager
MacDermid, Incorporated
1221 Farrow
Ferndale, Michigan 48220

James Voorhees, Jr.
Manager, Geosciences
Midwest Region
OHM Corporation
16406 U.S. Route 224 East
P.O. Box 551
Findlay, Ohio 45839-0551

Steve Blayer, MDNR

bcc: File

5HR-JCK-\KLEVS\KLEVS\6-6195\DISK 2\SCHEDULE.RFI\February 19, 1991

2/20/91

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA PERMITTING BRANCH (RPB)										
TYPIS	AUTH.	ILS CHIEF	INS CHIEF	MIS CHIEF	MN/WI CHIEF	OHS CHIEF	SWS CHIEF	RPB CHIEF	RCRA ASOC.DR	WASTE MGMT. DIV.DIRECTOR
MK	MK			RLD				LSB		
2/19/91	2/19/91			2/19/91				2/20/91		

371-9



MacDermid
INCORPORATED

245 FREIGHT STREET - WATERBURY, CT 06702 - TELEPHONE (203) 575-5700 - TELEX 4436011 - INTL. FAX 203-575-7900 - DOM. FAX 203-575-5630

February 8, 1991

Ms. Mardi Klevs
US EPA
Region V
Office of RCRA (5HR-13)
Michigan Section
230 Dearborn Street
Chicago, IL 60604

RECEIVED
FEB 15 1991
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Dear Ms. Klevs:

RE: REVISION 6, AMENDED RFI SCHEDULE --MACDERMID FERNDAL
FACILITY, MID 005 338 371 (SEPTEMBER 24, 1990)

MacDermid, Inc. in conjunction with its principal consultant, OHM Remediation Services Corporation, is pleased to enclose the revised schedule for the above-referenced RFI program outlining the OHM tasks and corresponding deadlines. Please note that a comprehensive Final RFI Report (including Operable Units 1, 2 and 3) will be produced upon approval of the Draft RFI Report for Operable Unit 3. This approach will help to consolidate the data from all of the operable units into an all-inclusive Final RFI Report. It should be noted, that MacDermid agrees in principal to submit a Draft CMS Report within 90 days of notice if the Regional Administrator deems that Corrective Action is necessary after review of Final RFI Report on Operable Units 1 & 2.

If there are any questions concerning the comments and attached schedule, please feel free to call or fax me your comments. Your time and cooperation with this project is greatly appreciated.

Sincerely,

Frank J. Cruice, RS, ASP, CHCM
Corporate Director
Safety & Regulatory Affairs

cc: J. Batozynski
J. Voorhees
P. Potts
R. Vee

FINAL RFI SCHEDULE FOR 1991
MACDERMID INCORPORATED
(JANUARY 31, 1991)

<u>Facility Submission</u>	<u>Due Date/Review Period</u>
Tasks I and II (Operable Units 1, 2 & 3)* Current Conditions Pre-Investigative CMS Technologies	February 26, 1991 February 26, 1991
Task III Draft RFI Work Plan (Operable Units 1 & 2, sampling schedule)*	February 26, 1991
Draft RFI Work Plan (Operable Unit 3, sampling schedule)*	May 30, 1991
Final RFI Work Plan (Operable Units 1 & 2)*	60 days after receipt of Regional Administrator's comments on the Draft RFI Work Plan-Task 3 (Operable Units 1 & 2)
Final RFI Work Plan (Operable Unit 3)*	60 days after receipt of Regional Administrator's comments on the Draft RFI Work Plan-Task 3 (Operable Unit 3)
Draft RFI Final Report (Operable Units 1 & 2)*	No later than 180 days after the Final RFI Work Plan (for Operable Units 1 & 2) is approved by the Regional Administrator
Draft RFI Final Report (Operable Unit 3)*	No later than 180 days after the Final RFI Work Plan (for Operable Unit 3) is approved by the Regional Administrator Administrator
Final RFI Report (Operable Units 1 & 2)*	60 days after receipt of Regional Administrator's comments on the Draft RFI Reports (Operable Units 1 & 2)
Final RFI Report (Operable Unit 3)*	60 days after receipt of Regional Administrator's comments on the Draft RFI Reports (Operable Unit 3)

*Operable Unit 1 = Two closed surface impoundment areas

*Operable Unit 2 = Abandoned railroad spur

*Operable Unit 3 = Units that emit air contaminants (i.e. original location
of incinerator and associated area, as well as scrubber
units associated with the recycling/reclaiming process)



OHM Corporation

January 31, 1991

RECEIVED
FEB 4 1991

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Ms. Mardi Klevs
United States Environmental
Protection Agency
Region V
Office of RCRA (5HR-13)
Michigan Section
230 South Dearborn Street
Chicago, IL 60604

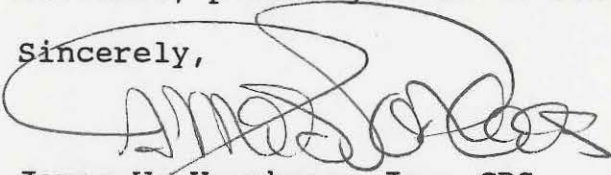
Dear Ms. Klevs:

RE: REVISION 4, AMENDED RFI SCHEDULE--MACDERMID FERNDAL
FACILITY, MID 005 338 371 (SEPTEMBER 24, 1990)

OHM Remediation Services Corp. (OHM), a wholly owned subsidiary of OHM Corporation, is pleased to enclose a revised schedule for the above-referenced RFI program outlining the OHM tasks and corresponding deadlines. Please note that a comprehensive Final RFI Report (including Operable Units 1, 2, and 3) will be produced upon approval of the Draft RFI Report for Operable Unit 3. This approach will help to consolidate the data from all of the operable units into an all-inclusive Final RFI Report.

If you have any questions or comments concerning this revised schedule, please give me or Pat Potts a call at 800-537-9540.

Sincerely,


James W. Voorhees, Jr., CPG
Manager, Geosciences
Midwest Region

Attachment

pc: Jim Batozynski
Frank Cruice
Pat Potts
Rick Veen
Project 9961.4

FINAL RFI SCHEDULE FOR 1991
MACDERMID INCORPORATED
(JANUARY 31, 1991)

Facility SubmissionDue Date/Review Period

Tasks I and II

February 26, 1991

(Operable Units 1, 2,
and 3)*
Current Conditions
Pre-Investigative CMS
Technologies

Task III

Draft RFI Work Plan
(Operable Units 1 and 2,
sampling schedule)*

May 30, 1991

Draft RFI Work Plan
(Operable Unit 3,
sampling schedule)*

Final RFI Work Plan
(Operable Units 1 and 2)*

60 days after receipt of Regional
Administrator's comments on the Draft RFI
Work Plan-Task 3 (Operable Units ~~1, 2, and 3~~ 1+2)

Final RFI Work Plan
(Operable Unit 3)*

60 days after receipt of Regional
Administrator's comments on the Draft RFI
Work Plan-Task 3 (Operable Unit 3)

Draft RFI Final Report
(Operable Units 1 and 2)*

No later than 180 days after the Final
RFI Work Plan (for Operable Units 1
and 2) is approved by the Regional
Administrator

Draft RFI Final Report
(Operable Unit 3)*

No later than 180 days after the Final
RFI Work Plan (for Operable Unit 3) is
approved by the Regional Administrator

Final RFI Report
(Operable Units 1, 2,
and 3)*

60 days after receipt of Regional
Administrator's comments on the Draft
RFI Reports (Operable Units 1, 2, and 3)

- Final RFI Report (Operable Unit 3)*
60 days after receipt of Regional Administrator's comments on the Draft RFI Report (Operable Unit 3).
- * Operable Unit 1 = Two closed surface impoundment areas
 - * Operable Unit 2 = Abandoned railroad spur
 - * Operable Unit 3 = Units that emit air contaminants (i.e., original location of incinerator and associated area, as well as scrubber units associated with the recycling/reclaiming process)

FINAL RFI SCHEDULE FOR 1991
MACDERMID INCORPORATED
(JANUARY 31, 1991)

<u>Facility Submission</u>	<u>Due Date/Review Period</u>
Tasks I and II (Operable Units 1, 2, and 3)* Current Conditions Pre-Investigative CMS Technologies	February 26, 1991
Task III Draft RFI Work Plan (Operable Unites 1 and 2, sampling schedule)*	
Draft RFI Work Plan (Operable Unit 3, sampling schedule)*	May 30, 1991
Final RFI Work Plan (Operable Units 1 and 2)*	60 days after receipt of Regional Administrator's comments on the Draft RFI Work Plan-Task 3 (Operable Units 3)
Final RFI Work Plan (Operable Unit 3)*	60 days after receipt of Regional Administrator's comments on the Draft RFI Work Plan-Task 3 (Operable Unit 3)
Draft RFI Final Report (Operable Units 1 and 2)*	No later than 180 days after the Final RFI Work Plan (for Operable Units 1 and 2) is approved by the Regional Administrator
Draft RFI Final Report (Operable Unit 3)*	No later than 180 days after the Final RFI Work Plan (for Operable Unit 3) is approved by the Regional Administrator
Final RFI Report (Operable Units 1, 2, and 3)*	60 days after rceipt of Regional Administrator's comments on the Draft RFI Reports (Operable Units 1, 2, and 3)

* Operable Unit 1 = Two closed surface impoundment areas

* Operable Unit 2 = Abandoned railroad spur

* Operable Unit 3 = Units that emit air contaminants (i.e.,
original location of incinerator and associated area,
as well as scrubber units associated with the
recycling/reclaiming process)



OHM Corporation

January 18, 1991

Ms. Mardi Klevs
United States Environmental
Protection Agency
Region V
Office of RCRA (5HR-13)
Michigan Section
230 South Dearborn Street
Chicago, IL 60604

RECEIVED
JAN 22 1991
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V


Dear Ms. Klevs:

RE: REVISION 3, AMENDED RFI SCHEDULE--MACDERMID FERNDAL
FACILITY MID 005-338-371 (DECEMBER 21, 1990)

Pursuant to our conversation this date, I have taken the liberty of changing the format for the above-referenced schedule to depict the OHM tasks and due dates required under the USEPA RFI/CMS guidelines. Also attached is a brief outline of the Technical Oversight and Modified RCRA Facility Investigation Work Plan for the referenced RFI schedule.

If there are any questions or comments in relationship to the presented materials, do not hesitate to contact me or Ms. Pat Potts at 800-537-9540.

Sincerely,


James W. Voorhees, Jr., CPG
Manager, Geosciences
Midwest Region

JWV:cj

Attachment

pc: Jim Batozynski
Frank Cruice
Pat Potts
Rick Veen
Project 9961.3

ATTACHMENT 1

**FINAL RFI SCHEDULE FOR 1991
MACDERMID INCORPORATED**

DRAFT
RFI SCHEDULE FOR 1991
MACDERMID INCORPORATED

<u>Facility Submission</u>	<u>Due Date/Review Period</u>
Tasks I and II (Operable Units 1, 2, and 3) A. Current Conditions B. Pre-Investigative CMS Technologies	February 26, 1991
Task III (Operable Units 1, 2, and 3) A. Draft RFI Work Plan (Sampling Scheduling)	90 day after Regional Administrator determines that Task 3 is necessary.
Final RFI Work Plan	60 days after receipt of Regional Administrator's comments on the Draft RFI Work Plan.
B. Draft RFI Final Report (Field and Analytical Data)	No later than 180 days after the Final RFI Work Plan is approved by the Regional Administrator.
Final RFI Report	60 days after receipt of Regional Administrator's comments on the Draft RFI Report.

RFI/CMS WORK PLAN OUTLINE
MACDERMID INCORPORATED

TASK 1

Description of Current Conditions

- o File and document research
- o Maps and charts of site, localized description
- o Nature and extent of contaminations
- o Implementation of interim measures
(past/present)
- o Air quality incinerator and plant emissions

TASK 2
(Report)

Preinvestigation Evaluation of Corrective
Measure Technologies

Detailed report on existing and potential on-site corrective measures and technologies involved. Included evaluation and off-site corrective measures needed to abate migration.

TASK 3

Exploratory Site Evaluation

- o Ground-water sampling
- o Shallow borehole-lagoon closures
- o Ground-water and soil analyses
- o Draft report on RFI-field findings and required CMS
- o Final RFI and CMS



OHM Corporation

January 16, 1991

Ms. Mardi Klevs
United States Environmental
Protection Agency
Region V
Office of RCRA (5HR-13)
Michigan Section
230 South Dearborn Street
Chicago, IL 60604



Dear Ms. Klevs:

RE: AMENDED RFI SCHEDULE--MACDERMID FERNDAL FACILITY
MID 005-338-371 (DECEMBER 21, 1990)

OHM Remediation Services Corp. (OHM), a wholly owned subsidiary of OHM Corporation, is pleased to submit per your request to Mr. Frank Cruice, director of Environmental Affairs for MacDermid, Incorporated, the attached reissuance of the above-referenced document.

To reiterate your telephone conversation with Mr. John Carson yesterday concerning air quality modeling criteria, the following elements will be utilized in the drafting of the MacDermid RFI project:

- o USEPA's acceptance in utilizing mass balance, in lieu of source assessment sampling, to estimate air emissions from waste processing and handling operations.
- o Your suggestion was that the process emissions be modeled at a standard rate. The vapor concentration/dry deposition contours will be the same, modulo a proportionality constant for all hazardous constituents and particulates.
- o Your confirmation that the correct wind dispersion coefficient to use in running the ISCLT model for the MacDermid facility is the U3.

January 16, 1991

We appreciate your time and patience in the progress of this RFI/CMS project. If there are any questions on the attached amended schedule, please do not hesitate to contact me at 800-537-9540.

Sincerely,



James W. Voorhees, Jr., CPG
Manager, Geosciences
Midwest Region

JWV:at

Attachment

pc: Jim Batozynski
Frank Cruice
Pat Potts
Rick Veen
Project 9961.2

ATTACHMENT 1

DRAFT
RFI SCHEDULE FOR 1991
MACDERMID CORPORATION

DRAFT
RFI SCHEDULE FOR 1991
MACDERMID CORPORATION
OHM PROJECT NO. 9961
JANUARY 14, 1991

<u>Current Conditions/Pre- Investigation CMS Technologies</u>	<u>Due Date</u>
Tasks 1 and 2	
Draft RFI Work Plan (Task 3)	February 26, 1991
EPA Review RFI Draft	
Finish RFI Work Plan (Operable Units 1 and 2)	May 7, 1991
Air Quality RFI Work Plan (Operable Unit 3/Site Incinerator)	May 30, 1991
EPA Review Air Quality Draft	
Finish RFI Work Plan (Operable Unit 3)	July 9, 1991

FIELD SAMPLING SCHEDULE

Operable Unit 1, Railroad Spur and West Side of Building

Soil borings and ground- water samples (4 days)	April 29 to May 29, 1991
Sample analysis (14 days turnaround time)	
Report on Operable Unit 1	May 28, 1991

Operable Unit 2, Lagoon Area

Soils

Borings and ground- water samples (5 days)	May 6 to July 23, 1991
---	------------------------

Soil sample analysis (14 days
turnaround time)

Ground Water

Install monitor wells (8 to 10 days)	May 6 to July 23, 1991
---	------------------------

Initial gauging of wells

Develop and gauge wells

DRAFT
RFI SCHEDULE FOR 1991 (CONTINUED)
MACDERMID CORPORATION
OHM PROJECT NO. 9961
JANUARY 14, 1991

Current Conditions/Pre-
Investigation CMS Technologies

Due Date

Sample monitor wells
(and gauge)

Water sample analysis (14 days
turnaround time)

Sample and gauge monitor
wells

Sample analysis

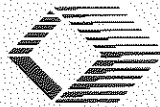
Report with recommendations
for remediation

July 23, 1991

Operable Unit 3, (Incinerator and
Plant Air Quality)

Implementation of RFI
Work Plan

August 30, 1991



OHM Corporation

December 21, 1990

Ms. Mardi Klevs (5HR-13)
Michigan Section
Office of RCRA
United States Environmental
Protection Agency
Region X
230 South Dearborn Street
Chicago, IL 60604

Dear Ms. Klevs:

RE: RFI SCHEDULE--MACDERMID FERNDAL FACILITY MID 005 338 371

As you requested during our meeting on November 26, 1990, OHM Remediation Services Corp. (OHM), a wholly owned subsidiary of OHM Corporation, is pleased to provide you with a revised schedule (see Attachment 1) for conducting the RFI at MacDermid's Ferndale, Michigan, facility.

The proposed schedule organizes the investigation around three operable units. These units are:

- o Operable Unit 1--Railroad spur area and west side of building
- o Operable Unit 2--Former lagoon area
- o Operable Unit 3--Plant area air quality (including former incinerator)

Our objective in organizing the investigation in this way is to permit us to focus first on the area where MacDermid has proposed construction of a hazardous materials storage facility. We hope this approach will help expedite the disposition of this facility.

It is our intent to address the current situation at all three units in the report for Tasks 1 and 2.

Along with the report for Tasks 1 and 2, we propose to submit a draft work plan for further field investigation at Units 1 and 2. The potentially affected media at these two units involves soil and ground water.

We propose to develop the work plan for the investigation related to Unit 3 after your review and comment on the Tasks 1 and 2 report. Our reason for this is simple. Unit 3 involves air quality issues. At the present time, the current conditions with respect to this unit are less defined than for the soil and ground water. Given this, it is difficult for us to predict the scope and duration of an air quality investigation at this time. We anticipate being able to supply a firm schedule in the work plan for Unit 3.

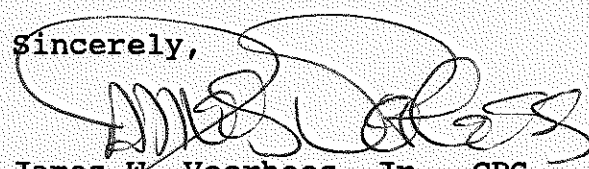
The results of the investigation at each unit will be presented in separate reports. The reports will also discuss remedial options.

With respect to remediation, MacDermid has requested us to convey to you the following statement:

"In the event that levels of contamination require remediation, please be assured that MacDermid intends to comply with all applicable remedial requirements."

We hope this proposed approach and schedule fulfills the objectives discussed at our November 26, 1990, meeting. In the event you have questions or would like to discuss it further, please contact either Rick Veen, OHM Michigan Division Manager at 517-484-7715 or me at 419-423-3526.

Sincerely,



James W. Voorhees, Jr., CPG
Manager, Geosciences
Midwest Region

JWV:11b

Attachment

pc: Project 9961

ATTACHMENT 1

**DRAFT
RFI SCHEDULE FOR 1991
MACDERMID CORPORATION**

DRAFT
RFI SCHEDULE FOR 1991
MACDERMID CORPORATION

<u>Current Conditions/Pre- Investigation CMS Technologies</u>	<u>Due Date</u>
Tasks 1 and 2	
Draft RFI Work Plan (Task 3)	February 26, 1991
EPA Review RFI Draft	April 30, 1991
Finish RFI Work Plan (Operable Units 1 and 2)	May 7, 1991
Air Quality RFI Work Plan (Operable Unit 3/Site Incinerator)	May 30, 1991
EPA Review Air Quality Draft	June 30, 1991
Finish RFI Work Plan (Operable Unit 3)	July 9, 1991

FIELD SAMPLING SCHEDULE

Operable Unit 1, Railroad Spur and West Side of Building

Soil borings and ground- water samples (4 days)	April 29 to May 29
--	--------------------

Sample analysis (14 days
turnaround time)

Report on Operable Unit 1	May 28
---------------------------	--------

Operable Unit 2, Lagoon Area

Soils

Borings and ground- water samples (5 days)	May 6 to July 23
---	------------------

Soil sample analysis (14 days
turnaround time)

Ground Water

Install monitor wells
(8 to 10 days)

Initial gauging of wells

Develop and gauge wells

DRAFT
RFI SCHEDULE FOR 1991 (CONTINUED)
MACDERMID CORPORATION

Current Conditions/Pre-
Investigation CMS Technologies

Due Date

Sample monitor wells
(and gauge)

Water sample analysis (14 days
turnaround time)

Sample and gauge monitor
wells

Sample analysis

Report with recommendations
for remediation

July 23

Operable Unit 3, (Incinerator and
Plant Air Quality)

Implementation of RFI
Work Plan

Duration will be
determined based on analy-
ses of plant stack oper-
ations and data avail-
able.

Meeting Report
November 26, 1990
MacDermid, Inc.
MID 005 338 371

Attendees

Mardi Klevs	U.S. EPA	(312) 886-6195
Richard Traub	U.S. EPA	(312) 886-6136
James Voorhees	OHM	(419) 426-0646
James H. Botzynski	MacDermid, Inc.	(313) 339-3553
Donald M. Fraser III	MacDermid, Inc.	(313) 399-3553
Frank J. Cruise	MacDermid, Inc.	(203) 575-7908

This meeting was requested by MacDermid, Incorporated. The purpose of the meeting was to discuss RCRA Facility Investigation (RFI)/Corrective Measures Study (CMS) responsibilities that were specified in the HSWA permit. MacDermid has appealed the HSWA permit, claiming that the RFI process is too lengthy.

MacDermid began its presentation by stating that the Company was interested in building a new storage facility near the railroad spur, and therefore anxious to resolve the railroad spur, incinerator, and air emissions questions. MacDermid proposed that those units be dealt with first, to be followed by further investigation and remediation of the lagoons.

I replied that these proposals were negotiable, but that U.S. EPA was most concerned that the Company get back on a schedule for the RFI/CMS.

Rich suggested that MacDermid could request a modified schedule by applying for a Class I modification, which could be accomplished with a letter and attached schedule. The Company was informed that they might receive a break on extensive monitoring requirements if they submitted in writing a commitment to remediate the lagoon area. Frank Cruise agreed to the stipulation, but noted that he would have to talk to the Company lawyer first.

MacDermid suggested that U.S. EPA, MDNR, and the Company meet with the Fern-Ridge Environmental Coalition to keep the community group informed of progress in the RFI/CMS. I agreed that was a good idea, but that I would prefer to postpone a meeting until I had a submitted schedule and RFI workplan.

We then went over each SWMU that required corrective action in the HSWA permit.

I asked the Company to explain why there were VOCs in the soil and groundwater in the lagoon area when the Company has claimed that they handled no organics in the facility. MacDermid said

that they didn't know the source but assumed that it was a one-time historical release. I informed them that they had to address this issue in the RFI.

I told to Company to model the incinerator and find the location of the highest deposited concentration. At the location of highest concentration, they were to take soil samples. MacDermid said that they did not have any operating parameters for the incinerator. I told them to use best engineering judgement if the information was unavailable.

I also asked to them to submit their 13 air permits. At this point, it came out in the conversation that the Company "doesn't not handle organics, it's just that they mainly handle inorganics, but add organics as an additive." After further questioning, they could not tell me whether they use organics in their reclamation processes.

There was some talk, inconclusive, about organics in the solder conditioner.

We agreed that MacDermid should submit a process diagram, their waste analysis data and any information concerning organic additives in their reclamation of wastes process.

To summarize, the Company will submit two packages: the first will be a letter with an accompanying schedule, asking for a Class I modification, and the second will be the Tasks 1,2, and 3 document.

Mandi Klevz
11-26-90

cc: R. Traub
S. Blayer, MDNR
File



OHM Corporation

November 19, 1990

Ms. Mardi Klevs (5 HR-13)
Michigan Section
RCRA
USEPA Region V
230 South Dearborn
Chicago, IL 60604

RECEIVED
NOV 20 1990

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

RE: MacDermid Ferndale Facility RFI
MID 005 338 371

Dear Ms. Klevs:

Enclosed you will find a summary of the proposed approach to initiate work at the MacDermid Ferndale facility. We are sending this to you at the request of Frank Cruice in preparation for our meeting on Monday, November 26, 1990.

We look forward to meeting with you then and discussing these and other pertinent issues.

Sincerely,

Richard A. Veen
Michigan Division Manager

RAV:vld

cc: Frank Cruice/MacDermid
James Batozynski/MacDermid

enclosure

MEETING WITH USEPA TO DISCUSS
RCRA FACILITY INVESTIGATION
MACDERMID FERNDALE FACILITY

The purpose of the meeting will be to review and discuss a modified approach to the RCRA facility investigation required under the conditions of Permit MID 005 338 371.

The intent of the modified approach is to produce statistically valid, properly documented data to sufficiently characterize the nature and extent of any environmental impairment which may exist at the following SWMU's so that corrective measures may be expediently selected.

- o Air quality
- o Railroad spur
- o Former incinerator
- o Former lagoons

The basic scope of the modified approach is outlined below.

Task 1, Description of Current Conditions

- o File and document research
- o Maps and charts of site, localized description
- o Nature and extent of contamination
- o Implementation of interim measures
- o Report

Task 2, Pre-Investigation Evaluation of Corrective Measure Technologies

- o On-site criteria
- o Off-site criteria
- o Report

Task 3, Exploratory Site Evaluation

- o Ground-water samples
- o Shallow boreholes--lagoon closures
- o Soil analyses
- o Air quality
- o Report

The work of Tasks 1 and 2 will conform to the scope specified in the permit guidelines for the RFI. The work of Task 3 will involve collection of supplemental data to further characterize the land based SWMU's. An approach to assessing air quality will be developed after review of historical data on the facility. We anticipate this data can be collected without the necessity of preparing the extensive planning documents identified in the permit as Task 3 RFI work plan. We envision a work plan of considerably less

magnitude which will nonetheless yield technically qualified data. Our expectation is that this data when coupled with the data from previous investigations of the site may produce a characterization and quantification of the site adequate to select an appropriate remedy for each unit addressed, if needed, at the completion of Task 3.

Advantages to this approach are it is considerably less expensive and time consuming for MacDermid and USEPA and it would avoid redundancy of data in some of the SWMU areas.

We feel this approach warrants consideration for two reasons. First, the site history does not suggest the presence of an extensive or complex contamination. Second, the site itself appears to be stratigraphically straight forward thus lending support to an uncomplicated investigation. A summary of these points follows.

Site Specific--Operational History

- o Incinerator--The incinerator was used until its removal from the site in 1976 for destruction of fiber barrels, paper, and general housekeeping burnables. Metal rings and non-parishables were collected and transported to a solid waste landfill for disposal.
- o Railroad Spur--According to interviews and documentation, nonhazardous material such as fiber barrels and diatomaceous earth were transported onto the site via this line.
- o Lagoons--Based on existing data, concentrations in these structures are moderate to low levels and the extent of residuals may be more precisely determined with some additional exploratory boreholes, sample analyses, and the installation of perimeter ground-water monitoring wells.

Historically, sludges were collected in the lagoons along with the aqueous residuals and treated in the on-site wastewater-treatment system. The presence of remaining lagoon residuals will be evaluated in Tasks 2 and 3.

- o Releases and Spills--Historically, incidents have been limited on this facility. The primary subsurface evaluation will be in the area of the lagoon residuals under the OHM Tasks 2 and 3.
- o Air Quality--Ambient quality will be addressed upon evaluation of historical data.

Site Specific--Characterization

- o Surface Water Collection--The topographic low of the facility collects surface water run off in the center of the site. The water and transported materials are collected in the drainage system and treated at the wastewater-treatment facility. Under these conditions, limited ponding or standing water collects.
- o Near-Surface Ground Water--According to the data from the boring logs and the local hydrogeology of the area, the water table is a perched structure and not a recharging system to the deeper ground-water aquifer.
- o Subsurface Geology--According to boring log information and the local geologic and soil studies available from this area, approximately 13 feet below the ground surface elevation, a 60-foot-thick clay stratum is located, thus limiting down-section percolation of materials deposited on or near the surface soils.

In summation, it is our view that the modified task approach to determining the extent of the environmental impact and potential mitigation at this facility, considering the size and operational background, is justified. Further, to utilize the requirements in the USEPA RFI guidelines (e.g., Performance Audit and System Audit procedures in the Data Collection Quality Assurance Plan, graphical display requirements in the Data Management Plan, Community Relations Plan etc.), would be overly expensive, repetitive, and time consuming for this size of project.



MacDermid
INCORPORATED

245 FREIGHT STREET - WATERBURY, CT 06702 - TELEPHONE (203) 575-5700 - TELEX 4436011 - INTL. FAX 203-575-7900 - DOM. FAX 203-575-5630

6 November 1990

Mardi Klevs (5HR-13)
Michigan Section
Office of RCRA
US E.P.A.
230 South Dearborn
Chicago, IL 60604

RECEIVED
NOV 09 1990
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

RE: CORRECTIVE ACTION MEETING

Dear Mardi:

This is a follow-up letter to confirm our meeting with Region V EPA concerning our Corrective Action at MacDermid's Ferndale, Michigan manufacturing facility. This is to confirm Monday November 26, 1990 at 10:30 A.M. at your office for the date of our meeting as had previously been discussed.

I will be accompanied by the Operations Manager and Facility Supervisor from Ferndale along with Rick Veen and Jim Voorhees from OHM and myself.

The purpose of our meeting is to show just cause why all the tasks outlined in the permits Corrective Action area maybe redundant and costly. It is MacDermid's position to reduce the number of tasks necessary and move in an expeditious manner with regards to remediating the operable units on our site.

Should you have any questions concerning this letter, please feel free to call me.

Sincerely,

Frank J. Cruice MS, ASP, CHCM
Corporate Director
Safety & Regulatory Affairs

cc: Steve Blayer, MI DNR
J. Batozynski
R. Veen, OHM
C. Landon

538-25

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE J. FLUHARTY
KERRY KAMMER
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES
David F. Hales, Director

DAVID F. HALES, Director

S.E. MICHIGAN FIELD OFFICE
Waste Management Division
505 W. Main
Northville, MI 48167

January 24, 1989

hus

MacDermid Inc.

1221 Farrow Avenue
Ferndale, MI 48220

ATTN: Mr. James H. Batozynski
Operations Manager

RE: MID 005338371

Dear Mr. Batozynski,

A financial assurance review has been performed on the Financial Test for compliance with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended; and Michigan's Hazardous Waste Management Act, Act 64 of 1979, as amended.

As result of that review, the following violations were noted:

1. The letter from the chief financial officer is not identical to the one specified by the Director (see attachment 1-Chief Financial official letter for current wording). Act 64, R299.9710(3)(a).
 - The letter must be addressed to the Director, Department of Natural Resources.
 - The first and fourth paragraphs regarding facilities and associated cost estimates were omitted.
 - The EPA identification number was not included for the facility.
 - Throughout the letter, words were replaced with other words and words were omitted.
2. A copy of the independent certified public accountant's report on examination of the owner's or operator's financial

Page 2, 1-24-89
MacDermid, Inc.
Ferndale, MI
RE: MID 005338371

statements for the latest completed fiscal year was not included. R299.9710(3)(b).

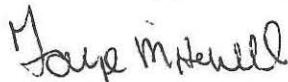
3. Also, not included was specific statements contained in a special report from the owner's or operator's independent certified public accountant to the owner or operator (see attachment for statements). R299.9710(3)(c).
4. The facility does not meet the criteria to pass the financial test as specified in Act 64, R299.9709(1).
 - Total assets in Michigan is less than \$50,000,000. Must have total assets in Michigan of not less than \$50,000,000 excluding the value of any land used for hazardous waste disposal.
 - Item 19 & 20 of Alternative I were omitted. (See attachments)
 - The numbering of the Alternative I document must match that in Act 64 (See Attachments).

Since the facility submitted an Act 64 operating license application, compliance with the financial requirement was evaluated with the requirements of Act 64, Part 7. Also, the new amendments to Act 64 (to be effective by mid to late February 1989) will require all permitted and interim status treatment, storage and disposal facilities to comply with Act 64, Part 7, within 180 days of the effective date.

We request your response by February 20, 1989 demonstrating these corrections to the Financial Test.

If you have any questions, please contact me at (313) 344-4670.

Sincerely,



Faye Mitchell
Environmental Quality Analyst

FM:bs
cc: B. Okwumabua
U.S. EPA, Region V

Inspection Priorities for RCRA Interim Status Financial Responsibility Requirements

MAcDeamid MID
00533837/

1.

265.140(c) Is this a State or Federal Facility? *NO*

FINANCIAL ASSURANCE REQUIREMENTS

265.142(a) Is the written closure cost estimate available? *yes*

265.144(a) Is the written post-closure cost estimate available? *N/A*

265.142(c) Have any revisions been made to the closure/post-closure cost estimates which increase the cost of closure/post-closure? *yes*

265.142(d) Have the closure/post-closure cost estimates been revised to reflect the increased cost of closure/post-closure? *yes*

265.142(b) Have the closure/post-closure cost estimates been updated to the current year by either recalculating the cost estimates or using an inflation factor derived from the most recent Implicit Price Deflator from the U.S. Department of Commerce? *yes*

Note: The annual Implicit Price Deflator covers the period from April 1987 to April 1988 (for example) and can be obtained from the Commerce Department Library in Chicago, (312) 353-4450.

1980 - 85.7	1984 - 108.1
1981 - 97.0	1985 - 111.7
1982 - 100.0 base year	1986 - 114.5
1983 - 103.8	1987 - 116.4

265.143 Which financial instrument(s) is used to assure closure/post-closure care costs?

	<u>Closure</u>	<u>Post-Closure</u>
	<input type="checkbox"/> Trust Fund *	<input type="checkbox"/> Trust Fund *
	<input type="checkbox"/> Surety Bond*	<input type="checkbox"/> Surety Bond*
	<input type="checkbox"/> Letter of Credit*	<input type="checkbox"/> Letter of Credit*
	<input type="checkbox"/> Insurance*	<input type="checkbox"/> Insurance*
	<input checked="" type="checkbox"/> Financial Test	<input type="checkbox"/> Financial Test
	<input type="checkbox"/> Corporate Guarantee	<input type="checkbox"/> Corporate Guarantee
265.143(f)	<input type="checkbox"/> Combination of above*	<input type="checkbox"/> Combination of above*
265.145(f)	Specify:	Specify:
265.143(g)	<input type="checkbox"/> One instrument for multiple facilities	<input type="checkbox"/> One instrument for multiple facilities
265.145(g)	specify:	specify:

- 265.146 Has the owner or operator used one instrument for financial assurance of both closure and post-closure care? *N/A*
- 265.142 Does the amount of the financial assurance instrument(s) equal
265.144 or exceed the current closure/post-closure cost estimates? *yes*
- 265.150 Has the State assumed responsibility for the facility's compliance with closure/post-closure care requirements? *NO*

LIABILITY REQUIREMENTS

- 265.147(a) Does the owner or operator have coverage for sudden accidental occurrences in an amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million, exclusive of legal defense costs? *yes*
- 265.147(a) What is the method of coverage?
- ☒ Insurance
 - ☐ Hazardous Waste Facility Endorsement, or
 - ☒ Certificate of Liability Insurance
 - ☐ Financial test.
 - ☐ Corporate Guarantee
 - ☐ Combination of financial test or corporate guarantee and insurance
- 265.147(b) Does the owner or operator of a surface impoundment, landfill, or land treatment facility which is used to manage hazardous waste have coverage for nonsudden accidental occurrences in the amount of at least \$3 million per occurrence with an annual aggregate of at least \$6 million, exclusive of legal defense costs? *N/A*
- 265.147(b) What is the method of coverage?
- ☐ Insurance
 - ☐ Hazardous Waste Facility Liability Endorsement, or
 - ☐ Certificate of Liability Insurance
 - ☐ Financial test
 - ☐ Corporate guarantee
 - ☐ Combination of financial test or corporate guarantee and insurance

- 265.147(e) After receiving final closure certifications from the owner or operator and an independent registered professional engineer, has the Director notified the owner or operator in writing that the owner or operator is no longer required to maintain liability coverage?
- 265.150 Has the State assumed responsibility for the owner's or operator's compliance with the liability requirements for sudden and/or nonsudden accidental occurrences?

Depending on the division of responsibility between the district offices and the central office in Lansing, the following may apply to a CEI inspection:

- 265.143 Does the wording of all financial instrument(s) match that
 265.145 in 264.151 and identify the Director of MDNR rather than the
 U.S. EPA Regional Administrator? *NO*
- 265.143(a) Are the closure/post-closure cost estimates calculated according to
 265.145(a) Federal and State requirements? *yes*
- 265.143 Have the procedures regarding the financial instrument(s) been
 265.145 followed? *yes*

5HR-13

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Frank J. Cruice
Corporate Director
Safety, Risk and Regulatory Compliance
MacDermid, Incorporated
254 Freight Street
Waterbury, CT 06702

RE: RFI Schedule
MacDermid, Incorporated
(Ferndale, Michigan)
MID 005 338 371

Dear Mr. Cruice:

Conditions III.A. and B. of the Hazardous and Solid Waste Amendments portion of the Resource Conservation and Recovery Act permit for MacDermid, Incorporated (Ferndale, Michigan) requires the facility to address corrective action for four solid waste management units. The purpose of this letter is to inform you that the United States Environmental Protection Agency approves the schedule that you submitted on for the submittals of the draft and final RCRA Facility Investigation (RFI) workplans and for the implementation of the RFI itself.

We look forward to receiving the draft workplans for Operable Units 1, 2, and 3. If you have any questions concerning this matter, please contact Mardi Klevs of my staff, at (312) 886-6195.

Sincerely yours,

Karl Bremer, Chief
RCRA Permitting Branch

cc: Jim Batozynski
Operations Manager
MacDermid, Incorporated
1221 Farrow
Ferndale, Michigan 48220

Steve Blayer, MDNR

Jim Voorhes

bcc: File

5HR-JCK-\KLEVS\KLEVS\6-6195\DISK 2\SCHEDULE.RFI\February 1, 1991